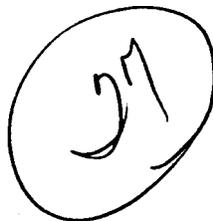


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A BLUEPRINT FOR THE FUTURE

*Presentation of Caroline Smith DeWaal
Director of Food Safety for the Center for Science in the Public Interest
at the 1998 Institute of Food Technologists Annual Meeting
Atlanta, Georgia
June 21, 1998*



Officials Trace Outbreak of Salmonella Poisoning to Cantaloupes

Food poisoning called shigellosis is on the rise

ATLANTA, Aug. 15 (AP) — Federal health officials said today that a "large nationwide outbreak" of salmonella food poisoning had been traced to an

The source of the bad melons is still unknown.

prompting efforts to fight it.

Health Concerns Mount Over Bacteria in Chickens

SPREADING THE WORD ABOUT E. COLI

41 SUNDAY, MAY 21, 1996 THE HERALD

1993 outbreak alerted slaughterhouses, SDA on how deadly bacteria can spread

A12 FRIDAY, AUGUST 22, 1997

Deadly Bacteria Found in Salads

THE WASHINGTON POST

Company Expands Beef Recall, Shuts Plant

Bacterium Cases Prompt L.A. Recall to Unusual Source



Botulism Suspected as Virulent Poisoning

Burger Recall Goes To 25 Million Pounds

Nebraska Plant

Infections are 'very likely the tip of the iceberg,' a health official says.

DENVER POST

Voice of the Rocky Mountain Empire

7 Reported Ill In New Jersey From Eating Tainted Meat

Tot's death believed E. coli

Girl, 1, dies after 2-week illness

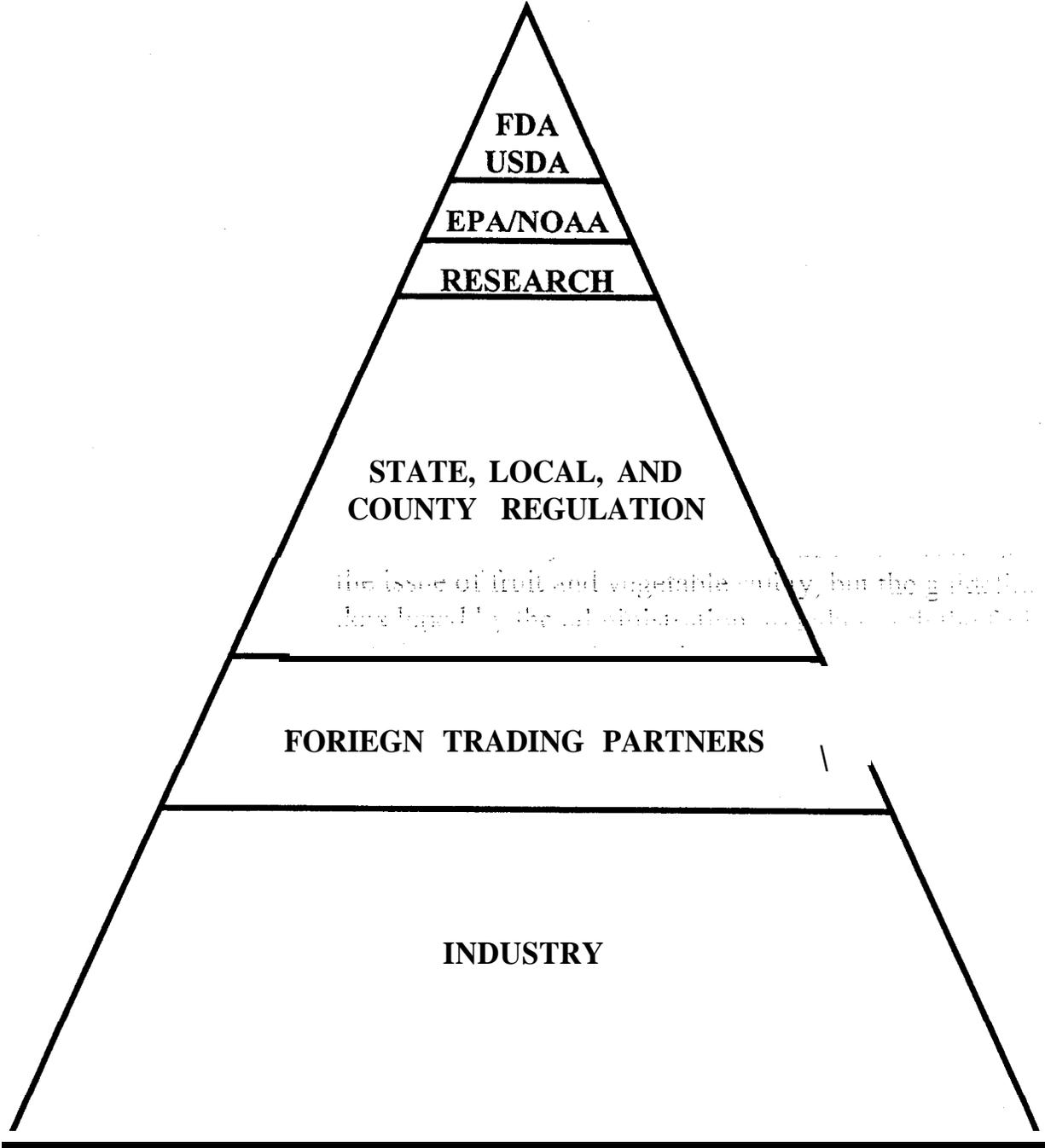
spoiled Fish Sickens 26 World Bank Employees

Officials Close Search for Bacteria

Children hospitalized with E. coli infections. Raising questions on role of cheese in Salmonella

BY ILLUSTRATION BY JAMES HILL

U.S. FOOD SAFETY SYSTEM



Food Safety Problems Fall Through the Cracks of Agency Jurisdiction

**Example: Lettuce and Other Fresh
Fruits and Vegetables**

- While USDA runs several farm-level programs to enforce quality standards for fruits and vegetables, no federal agency monitors and enforces food safety standards on the farm.
- Recent actions by the Clinton administration have focused attention on the issue of fruit and vegetable safety, but the guidelines being developed by the administration, together with the fruit and vegetable industry, are not enforceable.
- Farm-to-table food safety means that someone must have the authority and resources to address food safety problems at any point where they occur, from production to consumption. The resources and authority don't exist today anywhere in the federal government.

CREATE A COMPREHENSIVE FOOD SAFETY SYSTEM

Multiple Agencies Fail to Address Glaring Public Health Problems

Example: Shell Eggs Infected with *Salmonella enteritidis*

- Eggs and egg products are regulated by three separate federal agencies: the Food Safety and Inspection Service; the Agricultural Marketing Service; and the Food and Drug Administration.
- In the last 12 years, since CDC publicized the problem of internally contaminated eggs, not one of those agencies has taken effective action to address the problem.
- Numerous changes are needed to improve egg safety, from mandatory temperature controls and expiration dates to responsibility for egg safety being consolidated within a single agency.
- The safety of eggs and egg products should not be linked with an egg marketing program.

CREATE A HAZARD-BASED FOOD SAFETY SYSTEM

Some Food Processing Plants Get Two Different Food Safety Inspections

**Example: Frozen Pizza Processing
Plant**

- This system is not hazard-based. The pepperoni pizza line is being inspected too frequently while the cheese pizza line is seldom visited.
- Inspections should be given statutorily-defined parameters (like those currently found in the Federal meat and poultry inspection acts) that can be adjusted based on hazard. For example, HR 3676, the Consumer Food Safety Act of 1998, requires inspections of FDA-regulated processing plants be conducted at least quarterly. Under the bill, this frequency can be adjusted for plants that have exceptional safety records or for those producing negligible risk products.
- States with accredited inspection programs could conduct some of these inspections. Both state and federal food safety agencies should have integrated computer systems making inspection records readily available to regulators.

CREATE A HAZARD-BASED FOOD SAFETY SYSTEM

Some Food Processing Plants Get No Federal Food Safety Inspections

**Examples: Shellfish and Many Other
FDA-Regulated Plants**

- **FDA** has turned responsibility for some segments of the food industry completely over to the states, including high-risk products like oysters and other bivalve shellfish.
- Other plants may not be visited because FDA doesn't require food plants to register with the agency. The Inspector General for Health and Human Services reported in a 1991 investigation that FDA identifies food firms "by reviewing newspapers, magazines, phone books, industry publications, trade periodicals, surveillance reports, and consumer complaints. Inspectors may also walk through stores looking for new products." The Inspector General reported that some food plants escape detection for long periods of time.
- HR 3676, the Consumer Food Safety Act of 1998, requires registration of all food processors regulated by the FDA.

CREATE AN EFFECTIVE INSPECTION SYSTEM

Quality Inspections Occur More Frequently Than Safety Inspections

Examples: Shell Eggs, Seafood

- The Agricultural Marketing Service is apparently staffed adequately to inspect shell egg plants quarterly for sanitation. Despite their frequent visits, the AMS doesn't require that egg packing operations institute any controls for *Salmonella enteritidis*.
- The National Marine Fisheries Service has inspectors in the many seafood plants on a continuous basis.
- Some of the resources currently devoted to food quality would be better spent being devoted to food safety.

CREATE A UNIFIED INSPECTION SYSTEM

HACCP is a Different System at FDA and at USDA

**Example: Meat and Poultry
vs. Seafood vs. Low-Acid
Canned Food**

- The USDA HACCP program has appropriate government oversight, including on-site government inspections of HACCP systems and two levels of microbial monitoring for verification.
- The FDA HACCP program has infrequent inspection and no microbial verification.
- HACCP systems should be standardized across the government.
- Differences between programs should be readily explained based on the hazards related to the products and the processing requirements.

CREATE A UNIFIED FOOD SAFETY SYSTEM

Imported Products are Treated Differently at FDA and at USDA

**Example: Imported foods regulated
by FDA and USDA**

- USDA has a three-step process for assuring the safety of imported meat and poultry: country approval, plant approval, and random product inspections at the border.
- FDA relies on border inspection to assure the safety of imports. The agency currently inspects less than 2% of imported foods.
- Systems for assuring the safety of imports should be standardized across the government. Differences between approval systems should be readily explained based on the hazards applicable to the products.
- Systems for assuring the safety of imports should not be tied to export marketing programs.

CREATE A UNIFIED FOOD SAFETY SYSTEM

Fractured System Delays the Benefits of New Technologies

Examples: Competitive Exclusion; Trisodium phosphate; Irradiation

- Consumers want to know that new technologies have been fully evaluated for safety by the federal government.
- Multiple agencies frequently mean multiple approval processes. This can slow down the time between development and implementation of new technologies for improving food safety.

CREATE A STREAMLINED FOOD SAFETY SYSTEM

The U.S. May Export an Irrational Food Safety System

Example: Harmonization of Food Safety Standards

- The U.S. is already considered a world food safety leader. **Many** developing countries look to the U.S. to provide a model for food safety systems.
- The U.S. should harmonize its programs domestically before trying to harmonize them internationally. Differences between programs should be readily explained based on the hazards applicable to the products.

CREATE A HAZARD-BASED FOOD SAFETY SYSTEM

A BLUEPRINT FOR THE FUTURE

RECOMMENDATIONS TO THE NATIONAL ACADEMY OF SCIENCES

- **CREATE A HAZARD-BASED FOOD SAFETY SYSTEM**
- **CREATE A COMPREHENSIVE FOOD SAFETY SYSTEM**
- **CREATE AN INTEGRATED FOOD SAFETY SYSTEM**
- **CREATE A UNIFIED FOOD SAFETY AND INSPECTION SYSTEM**
- **CREATE A STREAMLINED FOOD SAFETY SYSTEM**
- **CREATE AN EFFECTIVE FOOD SAFETY SYSTEM**

THE TIME IS RIPE

- **HACCP IMPLEMENTATION**

- **FUNDING CRISIS**

- **GROWING INTERNATIONAL TRADE**

ELEMENTS OF HR 3676 THE CONSUMER FOOD SAFETY ACT OF 1998

INDUSTRY RESPONSIBILITIES

- HACCP
- PROCESS CONTROL
- USE OF AVAILABLE TECHNOLOGIES
- REGISTRATION

GOVERNMENT RESPONSIBILITIES

- HAZARD-BASED INSPECTION AND ENFORCEMENT
- APPROVAL AND VERIFICATION OF SYSTEMS
- OVERSIGHT OF IMPORTS
- SURVEILLANCE OF FOOD SUPPLY, INCLUDING OUTBREAK SURVEILLANCE